



Greenwood Skate Center

506 Three Springs Road • Bowling Green, Kentucky 42104 • Telephone (270) 843-3394

September 11, 2006

Ms. Beth A. O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort KY, 40602

RECEIVED


SEP 13 2006

PUBLIC SERVICE
COMMISSION

Re: Ken Merideth V. Warren County Water District
Case No. 2005-00313

Dear Ms. O'Donnell:

Enclosed please find the original, and eight (8) copies of a request for a clarification of WARREN COUNTY WATER DISTRICT'S ANSWERS TO INTERROGATORIES AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS.

Thank You,
Ken Merideth

Greenwood Skate Center

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter of:

KEN MERIDETH)
)
COMPLAINANT)
) *CASE NO. 2005-00313*
v.)
)
WARREN COUNTY WATER DISTRICT)
)
DEFENDANT)

REQUEST FOR CLARIFICATION OF WARREN COUNTY WATER
DISTRICT ANSWERS

Warren County Water District in their reply to the PSC request did furnish a list of customers with a combination connection. If you will refer to the Open Records Request filed with WCWD it was not disclosed. (See attachment 5)

WCWD answered (No. 6) that a letter like the one sent by Alan Vilines on May 11, 2005 was sent to all customers on the list in attachment 5. A copy of these letters was not provided, and neither were the names of whom these letters were sent to.

WCWD has a history of "baffling with bull" when they are unable to "dazzle with dazz". They were successful in the "385" hearings in narrowing the scope of that issue to deal with dedicated sprinkler access only. In their "baffle reply MEMORANDUM by Black & Veatch Corporation, (Item 2,) I am misinterpreted by their consultant to say "commodity fees" instead of "Standby Fees . If you will please refer to "385", both formal, and informal hearings- You will find much reference to both "Commodity, and Standby Fees being the issues addressed, with commodity charges for water not used being standby fees".

WCWD was not asked to provide a consultants review of why they have done what they have done, they were asked straight-forward to provide answers.

Mark Twain once stated that "There are three kinds of Lies, Lies, Damned Lies, and Statistics. This reply by WARREN COUNTY WATER DISTRICT is a rarity, it contains all three. With due respect to their legal counsel, the letter sent by Alan Vilines was sent

by him, not Mr. Moore, however the reply to your request is sent under the guise of legal counsel.

In their Memorandum, it is stated that "District billing summaries for a recent 12 month period indicate that the metered usage of all customers with 4-inch mere service connections averages slightly more than 60,000 gallons per month" It has been some years since I took Statistics in college, but I seem to recall that by using a select time, and a select sample, and computing the average (Is theirs the mean, the median, or the mode) of those figures, they can be bent to support most any result desired.- Hence we have Statistics! To have an average- one half would be above, and one-half below the median point, or the average. If there are 50 customers who have combination connections, then at least 12 of them would not be meeting the minimum commodity billing each month. The list provided includes schools, churches, and retail stores who all could fall into this class of customer.

If my understanding of the PSC regulations that all customers served by a water service with like usage should be charged the same rates. I have been unable to find any reference to a legal increase for a single customer based on "a lower volume of water usage relative to meter size" (Alan Vilines letter of May 11, 2005). I believe that this type of billing not only violates the directives of the PSC, but several applicable KRS statues, and Federal Statues pertaining to extortion, misuse of funds, criminal malfeasance, and probably RICO statues in consorting with legal counsel to cover up their misdeeds. I do not believe that WCWD, Alan Vilines, or their legal counsel ever sent letters to other customers like the one I received dated May 11, 2005. I believe they singled my business out in retaliation for my involvement with the PSC, and reporting the way they were billing their customers. Common sense mandates that they would not have sent this letter to all combination connection customers if as their memorandum states most were above the minimum billing for that size of connection. They have not produced the letters, or the persons they were sent to.

The final connection to a water system is now, and always has been determined by the utility that is being connected to. It is not right, just, or fair to require customers to rip up their parking lots, and spend thousands, and thousands of dollars to add additional unneeded plumbing just to comply with billing changes by a public utility. If they change their billing again in 5 years will I have to tear up the parking lot again to install a third line? Not only does this increase the cost of installation, but future maintance as well. The double detector check valve that has already been installed in these locations ensures that the utility will be able to bill accurately for all water used, without any standby fees, unfair commodity charges, or major reconstruction projects by the customers.

A fair compromise would be for all combination connections to pay for all water used, and not face a surcharge or fine for offering their staff, and customers the same security for their safety that is provided to both the staff of the PSC, and the staff at WCWD. This being the safety of working in a building with an approved sprinkler system in place.

Thank You,

A handwritten signature in cursive script that reads "Ken Mindeth". The signature is written in black ink and is positioned below the typed name "Ken Mindeth".

Ken Merideth

Copy to WCWD